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LLC; Instagram, LLC; and Siculus LLC f/k/a
Siculus, Inc.*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**TEMPORARY SEALING MOTION RE
DEFENDANTS' NOTICE OF MOTION
AND MOTION TO EXCLUDE
TESTIMONY OF SCHOOL DISTRICT
EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Defendants submit this Temporary Sealing Motion regarding Defendants' Motion to Exclude Testimony of School District Experts. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Whether document contains a Party's Confidential Information
ECF No. 2291-1	Motion for Exclude Testimony of School District Experts and Memorandum of Points and Authorities	Not redacted or sealed
ECF No. 2291-2	Declaration of Ashley M. Simonsen	Not redacted or sealed
ECF No. 2291-3	Ex. 1, May 16, 2025 Expert Report of Dr. Sharon Hoover	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-4	Ex. 2, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-5	Ex. 3, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-6	Ex. 4, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-7	Ex. 5, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Board of Education Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-8	Ex. 6, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-9	Ex. 7, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-10	Ex. 8, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Breathitt County	Temporarily filing under seal because document contains information that the parties may consider to be confidential

ECF No. 2291-11	Ex. 9, August 1, 2025 Rebuttal Report of Dr. Sharon Hoover for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-12	Ex. 10, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-13	Ex. 11, August 1, 2025 Rebuttal Report of Dr. Sharon Hoover for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-14	Ex. 12, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-15	Ex. 13, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-16	Ex. 14, May 18, 2025 Expert Report of Robert Klein for Breathitt County School District	Not redacted or sealed
ECF No. 2291-17	Ex. 15, May 18, 2025 Expert Report of Robert Klein for Charleston County School District	Not redacted or sealed
ECF No. 2291-18	Ex. 16, May 18, 2025 Expert Report of Robert Klein for DeKalb County School District	Not redacted or sealed
ECF No. 2291-19	Ex. 17, May 18, 2025 Expert Report of Robert Klein for Harford County Public Schools	Not redacted or sealed
ECF No. 2291-20	Ex. 18, May 18, 2025 Expert Report of Robert Klein for Irvington Public Schools	Not redacted or sealed
ECF No. 2291-21	Ex. 19, May 18, 2025 Expert Report of Robert Klein for Tucson Unified School District	Not redacted or sealed
ECF No. 2291-22	Ex. 20, August 1, 2025 Rebuttal Report of Robert Klein for Breathitt County School District	Not redacted or sealed
ECF No. 2291-23	Ex. 21, August 1, 2025 Rebuttal Report of Robert Klein for Charleston County School District	Not redacted or sealed
ECF No. 2291-24	Ex. 22, August 1, 2025 Rebuttal Report of Robert Klein for DeKalb County School District	Not redacted or sealed

ECF No. 2291-25	Ex. 23, August 1, 2025 Rebuttal Report of Robert Klein for Harford County Public Schools	Not redacted or sealed
ECF No. 2291-26	Ex. 24, August 1, 2025 Rebuttal Report of Robert Klein for Irvington Public Schools	Not redacted or sealed
ECF No. 2291-27	Ex. 25, August 1, 2025 Rebuttal Report of Robert Klein for Tucson Unified School District	Not redacted or sealed
ECF No. 2291-28	Ex. 26, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-29	Ex. 27, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-30	Ex. 28, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-31	Ex. 29, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Board of Education Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-32	Ex. 30, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-33	Ex. 31, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-34	Ex. 32, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-35	Ex. 33, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-36	Ex. 34, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-37	Ex. 35, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Board of Education Harford County	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
ECF No. 2291-38	Ex. 36, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-39	Ex. 37, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-40	Ex. 38, May 19, 2025 Expert Report of Jeffrey Meyers for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-41	Ex. 39, May 19, 2025 Expert Report of Jeffrey Meyers for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-42	Ex. 40, May 19, 2025 Expert Report of Jeffrey Meyers for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-43	Ex. 41, May 19, 2025 Expert Report of Jeffrey Meyers for Board of Education of Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-44	Ex. 42, May 19, 2025 Expert Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-45	Ex. 43, May 19, 2025 Expert Report of Jeffrey Meyers for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-46	Ex. 44, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-47	Ex. 45, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-48	Ex. 46, July 25, 2025 Expert Reply Report of Jeffrey Meyers for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential

ECF No. 2291-49	Ex. 47, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Board of Education of Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-50	Ex. 48, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-51	Ex. 49, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-52	Ex. 50, May 16, 2025 Expert Report of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-53	Ex. 51, July 30, 2025 Rebuttal Expert Report of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-54	Ex. 52, May 19, 2025 Expert Report of Dr. Bryce Ward for Breathitt County Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-55	Ex. 53, May 19, 2025 Expert Report of Dr. Bryce Ward for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-56	Ex. 54, May 19, 2025 Expert Report of Dr. Bryce Ward for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-57	Ex. 55, May 19, 2025 Expert Report of Dr. Bryce Ward for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-58	Ex. 56, May 19, 2025 Expert Report of Dr. Bryce Ward for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-59	Ex. 57, May 19, 2025 Expert Report of Dr. Bryce Ward for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-60	Ex. 58, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Breathitt County Schools	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
ECF No. 2291-61	Ex. 59, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-62	Ex. 60, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-63	Ex. 61, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-64	Ex. 62, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-65	Ex. 63, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-66	Ex. 64, Volume 1 of Dr. Sharon Hoover's Deposition, taken August 12, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-67	Ex. 65, Volume 2 of Dr. Sharon Hoover's deposition, taken August 13, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-68	Ex. 66, September 5, 2025 deposition of Robert Klein	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-69	Ex. 67, August 27, 2025 deposition of Dr. Douglas Leslie	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-70	Ex. 68, August 22, 2025 deposition of Jeffrey Meyers	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-71	Ex. 69, September 4, 2025 deposition of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential

ECF No. 2291-72	Ex. 70, August 15, 2025 deposition of Dr. Bryce Ward	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-73	Ex. 71, Materials Considered List (Exhibit B) to Dr. Brian Osborne's May 16, 2025 Expert Report	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-74	Ex. 72, Federal Judicial Center's <i>Reference Guide on Survey Research</i> , 359 Fed. Judicial Ctr. & Nat'l Academies Press (3rd ed. 2011)	Not redacted or sealed
ECF No. 2291-75	Ex. 73, <i>Improving the Quality of Retrospective Reports: Calendar Interviewing Methodologies</i> , Program in Survey Research & Methodology (Working Paper No. 12)	Not redacted or sealed
ECF No. 2291-76	Ex. 74, <i>Evaluating Survey Quality in Today's Complex Environment</i> , Am. Ass'n for Pub. Opinion Research (2016)	Not redacted or sealed
ECF No. 2291-77	Ex. 75, <i>School Counselor Roles & Ratios</i> (2025)	Not redacted or sealed
ECF No. 2291-78	Ex. 76, SHAPE District Profile for Breathitt County Schools (2019)	Not redacted or sealed
ECF No. 2291-79	Ex. 77, SHAPE District Profile for DeKalb County School District (2019)	Not redacted or sealed
ECF No. 2291-80	Ex. 78, DeKalb County School District's Third Amended Plaintiff Fact Sheet	Designated confidential by Plaintiff
ECF No. 2291-81	Ex. 79, July 30, 2025 Rebuttal Report of Dr. Sharon Hoover	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-82	Ex. 80, June 6, 2025 thread involving Melissa Yeates, Joseph Sandoval-Bushur, and others	Not redacted or sealed
ECF No. 2291-83	Ex. 81, cited excerpts of Julia Shivandona's April 8, 2025 Rule 30(b)(6) deposition	Not redacted or sealed
ECF No. 2291-84	Ex. 82, Common Core of Data – America's Public Schools (2023 – 2024)	Not redacted or sealed
ECF No. 2291-85	Ex. 83, <i>The Professional Standards of the National Association of School Psychologists</i> (2019)	Not redacted or sealed
ECF No. 2291-86	Ex. 84, May 2, 2025 Affidavit of Daphne Noble	Not redacted or sealed
ECF No. 2291-87	Ex. 85, May 13, 2025 Affidavit of Dr. April Vauss	Not redacted or sealed
ECF No. 2291-88	Ex. 86, May 15, 2025 Affidavit of Lisa Allison	Not redacted or sealed

ECF No. 2291-89	Ex. 87, May 16, 2025 Affidavit of Monika Davis	Not redacted or sealed
ECF No. 2291-90	Ex. 88, May 5, 2025 Affidavit of Phillip Watts	Not redacted or sealed
ECF No. 2291-91	Ex. 89, May 13, 2025 Declaration of Holly Hammel	Not redacted or sealed
ECF No. 2291-92	Ex. 90, Plaintiff Board of Education of Harford County's Amended Responses and Objections to Defendants' Interrogatories (Set 3), dated April 14, 2025	Designated confidential by Plaintiff
ECF No. 2291-93	Ex. 91, cited excerpts of the May 7, 2025 deposition of Bernard Hennigan	Not redacted or sealed
ECF No. 2291-94	Ex. 92, May 16, 2025 Rule 30(b)(6) deposition of Dr. April Vauss	Not redacted or sealed
ECF No. 2291-95	Ex. 93, cited excerpts of the June 30, 2025 deposition of Julie Shivandona	Not redacted or sealed
ECF No. 2291-96	Ex. 94, cited excerpts of the Rule 30(b)(6) deposition of Andrew Moore	Not redacted or sealed
ECF No. 2291-97	Ex. 95, cited excerpts of the Rule 30(b)(6) deposition of Robert Ross	Not redacted or sealed
ECF No. 2291-98	Ex. 96, cited excerpts of the May 23, 2025 deposition of Sabrina Salmon	Not redacted or sealed
ECF No. 2291-99	Proposed Order	Not redacted or sealed

DATED: September 30, 2025

Respectfully submitted,

By: /s/ Ashley M. Simonsen

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Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing and its attachments will be served electronically on counsel for Plaintiffs to the email addresses that were designated by counsel for that purpose

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on September 30, 2025.

/s/ Ashley M. Simonsen

Ashley M. Simonsen